

## REMARKS

This is intended as a full and complete response to the Notice of Non-Responsive Amendment dated May 24, 2005. The Examiner's Notice pertains to a Response to Office Action dated December 7, 2004 (filed by Applicants on March 2, 2005). Please accept this Corrected Response as a substitute for the full and complete Response to Office Action Dated December 7, 2004 which was filed on March 2, 2005. The Remarks below include the substance of the prior response, which was not entered. Please reconsider the claims pending in the application for reasons discussed below.

The Examiner issued the Notice of Non-Responsive Amendment following filing of the prior response stating that new claim 32 was drawn to a non-elected species. Non-entered claim 32 and claims 33-37 which depend thereon have been removed from this Corrected Response.

Although Applicants are not re-presenting claims 32-37, Applicants submit that that the Examiner incorrectly issued the Notice of Non-Responsive Amendment since claims 32-37 were not drawn to any of the previously identified species. Therefore, this improper characterization has resulted in delay from May 24, 2005 until the date of the next office action.

In the specification, the paragraphs [0009], [0039] and [0060] have been amended to correct minor editorial problems.

Claims 1-7 remain pending in the application and are shown above. Claims 8-24 have been canceled by the Applicants. Claims 1-7 are rejected. Applicants have added new claims 25-31 to claim additional aspects of the invention. Applicants submit that the changes made herein do not introduce new matter.

Claims 1-7 are amended to clarify the invention. These amendments are not presented to distinguish a reference, thus, the claims as amended are entitled to a full range of equivalents if not previously amended to distinguish a reference.

### **I. REJECTION OF CLAIMS UNDER 35 U.S.C. §102(b) OR §103(a), CLAIMS 1-7.**

Claims 1-7 are rejected under 35 U.S.C. §102(b) as anticipated by or, in the alternative, under 35 U.S.C. §103(a) as obvious over *Bajaj, et al.* (U.S. 6,261,157 B1, issued July 17, 2001). Applicants respectfully traverse the rejection. Applicants have amended claims 1-7. Applicants submit that the amendments do not introduce new matter.

Applicants submit that *Bajaj, et al.* does not anticipate claims 1-7 as the reference fails to teach, show or suggest polishing the substrate with a first polishing composition and an abrasive free polishing article until bulk dielectric material is substantially removed, and polishing the substrate with a second polishing composition and a fixed-abrasive polishing article to remove residual bulk dielectric material and expose the patterned dielectric material between feature definitions as recited in claim 1. *Bajaj, et al.* teaches a standard polishing pad used to polish away most of the conductive layer in a conventional slurry based process. (*Bajaj, et al.*, col. 7 lines 17-20). A fixed abrasive pad is used to polish away the rest of a conductive layer. (*Bajaj, et al.*, col. 7 lines 34-36). Another standard polishing pad is used to polish away the barrier layer in a conventional slurry based process. (*Bajaj, et al.*, col. 7 lines 54-56). Therefore, *Bajaj, et al.*, does not teach, show, or suggest, polishing a bulk dielectric layer as recited in claim 1, and claims 2-7 dependent thereon. Accordingly, the Applicants respectfully request the rejection of claim 1 and claims 2-7 which depend thereon, based on *Bajaj, et al.* be withdrawn, and the claims be allowed.

New claims 25-31 have been added. Applicants believe that claims 25-31 are fully supported by the specification and no new matter has been entered. Applicants submit that *Bajaj, et al.* does not anticipate claims 25-31 as the reference fails to teach, show or suggest polishing the substrate with a first polishing composition and an abrasive free polishing article until bulk dielectric material is substantially removed, and polishing the substrate with a second polishing composition and a fixed-abrasive polishing article to remove residual bulk dielectric material to expose the patterned dielectric material between feature definitions as recited in claim 25. The applicable teachings of *Bajaj, et al.* are discussed above. *Bajaj, et al.*, does not teach, show, or suggest, polishing a bulk dielectric layer as recited in claim 25, and claims 26-31

dependent thereon. Accordingly, claims 25-31 are patentable over the art of record as discussed above. The Applicants respectfully request the allowance of claims 25-31.

In conclusion, the reference cited by the Examiner does not teach, show, or suggest the invention as claimed.

The secondary references made of record are noted. However, it is believed that the secondary references are no more pertinent to the Applicants' disclosure than the primary references cited in the office action. Therefore, Applicants believe that a detailed discussion of the secondary references is not necessary for a full and complete response to this office action.

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



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